

9441.1986(32)

DRY CLEANING AND MAINTENANCE SERVICES WASTE NOT EXCLUDED
AS HOUSEHOLD WASTE

APR 21 1986

Mr. Thomas J. Fronapfel, PE
Waste Management Section
Division of Environmental
Protection
State of Nevada Department
of Conservation and
Natural Resources
Capitol Complex
Carson City, Nevada 89710

Dear Mr. Fronapfel:

To follow up on our recent conversation, and in response to your letter of April 2, 1986, this confirms that wastes from dry-cleaning services and maintenance services at hotels and motels are not excluded as household wastes under the exclusions of 40 CFR 261.4

The exclusion cited above was intended to remove normal households from regulatory control under the Resource Conservation and Recovery Act (RCRA). This was extended to normal household-type waste from hotels, motels, etc. For example, empty containers and the like resulting from normal room cleaning or pesticide spraying of the room could be excluded. However, dry-cleaning and vehicle fleet or equipment maintenance are not routine household operations; wastes resulting from such activities at hotels and motels, if hazardous, are subject to RCRA regulatory control.

This interpretation is for the Federal RCRA program. Since Nevada has final authorization for the RCRA program, it is their rules which will apply in this case; in accordance with the statute, your regulations or standards may be more stringent than the Federal rules. If you have any other questions, please call our hotline at 800/424-9546 or call me direct at 902/382-4770.

RO 12624

Sincerely,

Alan Corson
Deputy Director
Characterization and Assessment
Division (WH-5628)